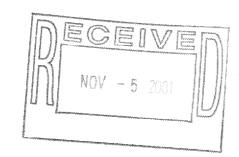


Innovative Nutrition Solutions

4388 '01 NOV 27 P1:36



October 24, 2001

Food and Drug Administration Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition 200 C Street, SW Washington, DC 20204

Dear Sirs:

Notice is hereby given that Rexall Sundown, Inc. ("Sundown") located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Sundown brand name bearing the following statement(s) on the label and/or in the labeling:

<u>Cranberry Fruit</u>: [For] healthy urinary function. Cranberry is one of nature's most beneficial aids for supporting healthy urinary tract function. Research indicates cranberry fruit contains beneficial compounds that help to maintain a healthy urinary tract by supporting a normal bacterial population.

<u>Vitamin C, Echinacea [and] Zinc</u>: Maintain healthy immune function with these Sundown products.

The undersigned certifies that the information contained in this notice is complete and accurate and that Sundown has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely, Delbrah Shun In NG

Deborah Shur Trinker, Esquire

Senior Vice President

Regulatory Affairs

Enclosure

975-0162 LET8775